

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION
IN ADMIRALTY**

RAY CAPITAL INC., OPPENHEIM
CAPITAL LTD, CHEYENNE
HOLDINGS LTD. AND LABROY
SHIPTRADE LIMITED

Plaintiffs,

vs.

M/V NEWLEAD CASTELLANO,
IMO NO. 9686338
HER ENGINES, TACKLE,
EQUIPMENT, FURNITURE,
APPURTENANCES, ETC., *IN REM*
AND
NEWLEAD CASTELLANO LTD.

Defendants

CIVIL ACTION FILE
NO. 4:16-cv-93

**REQUEST TO WITHDRAW AS COUNSEL AND AS LOCAL COUNSEL FOR
DEFENDANTS PURSUANT TO LOCAL RULE 83.7**

NOW COME attorneys THOMAS L. TISDALE and PHILIP THOMPSON and the firms of TISDALE LAW OFFICES, LLC in New York, New York and ELLIS, PAINTER, RATTERREE & ADAMS, LLP in Savannah, Georgia, and pursuant to Local Rule 83.7 respectfully request the Court to strike of record counsels' names and that of their firms as counsel and as local counsel for Defendants.

By email dated June 15, 2016, Mr. Tisdale formally notified Defendants of his intention to withdraw as counsel for the Defendants in the above-styled action. A copy of this notice email is attached hereto as Exhibit A. On June 16, 2016, Mr. Thompson formally notified Defendants by

email of his firm's intention to withdraw as local counsel for the Defendants in the above-styled action. A copy of this notice email is attached hereto as Exhibit B. The required fourteen (14) day period under Rule 83.7 has now elapsed since submission to Defendants of counsels' emails advising of their intention to withdraw as counsel and as local counsel.

Thomas L. Tisdale and Philip Thompson, along with their firms of Tisdale Law Offices, LLC and Ellis, Painter, Ratterree & Adams, LLP respectfully request the Court to strike of record the names of Thomas L. Tisdale and Tisdale Law Offices, LLC as counsel along with Philip Thompson and Ellis, Painter, Ratterree & Adams, LLP as local counsel for Defendants in the above-styled action.

This 30th day of June, 2016.

TISDALE LAW OFFICES, LLC

/s/Thomas L. Tisdale
Thomas L. Tisdale
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ELLIS, PAINTER, RATTERREE & ADAMS LLP

/s/Philip Thompson
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*Attorneys for Defendants Newlead Castellano Ltd. and M/V
NEWLEAD CASTELLANO*

Post Office Box 9946
Savannah, Georgia 31412
Telephone: (912) 233-9700

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the within and foregoing document on all parties in accordance with the directives from the Court Notice of Electronic Filing ("NEF") which was generated as a result of electronic filing as well as emailing a true and correct copy of the foregoing document to the parties listed below in accordance with Local Rule 83.7:

Spyros Theodoropoulos
VP Claims and Risks Management
NewLead Holdings Ltd.
83 Akti Miaouli & Flessa Street, 185 38 Piraeus, GREECE
stheodoropoulos@newleadship.com

Dated this 30th day of June, 2016.

ELLIS, PAINTER, RATTERREE & ADAMS LLP

/s/ Philip Thompson
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M/V NEWLEAD CASTELLANO

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